

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN  
DISTRICT OF TENNESSEE, WESTERN DIVISION AT MEMPHIS

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2005 AUG 29 PM 4: 03

LUCILLE PITTMAN, by and  
through her Next Friend and Attorney-in-Fact,  
VIOLA P. SYKES,

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W.D. OF TN, MEMPHIS

Plaintiff,

v.

NO. 04-3003-DP  
JURY DEMANDED

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W.D. OF TN, MEMPHIS

FILED BY car D.C.  
05 AUG 30 PM 4: 10

MOHAMAD J. AKBK, M.D.;  
MOHAMAD J. AKBK, M.D., P.C.;  
GREGORY EUGENE VANDEVEN, M.D.;  
SARAH GRIFFIN, R.N.;  
KAREN FRANKLIN, L.P.N.;  
KATHY WESSELS, R.N.; and  
DMC-MEMPHIS, INC. d/b/a DELTA MEDICAL CENTER,

Defendants.

MOTION TO AMEND THE RULE 16(b) SCHEDULING ORDER

COMES NOW the plaintiff, LUCILLE PITTMAN (hereinafter referred to as  
"Plaintiff"), by and through her Next Friend and Power of Attorney, VIOLA P. SYKES,  
pursuant to FED. R. CIV. P. 16, and moves this Court to amend the Rule 16(b) Scheduling  
Order to include the following deadlines:

COMPLETING ALL WRITTEN DISCOVERY:

- (a) DOCUMENT PRODUCTION: January 15, 2006
- (b) INTERROGATORIES AND REQUESTS FOR  
ADMISSION: January 15, 2006
- (c) DEPOSITIONS: January 15, 2006
- (d) EXPERT WITNESS DISCLOSURE (Rule 26):

**MOTION GRANTED**

DATE: 8-30-2005

Bernice Bouie Donald  
**BERNICE BOUIE DONALD**  
**U.S. DISTRICT JUDGE**

This document entered on the docket sheet in compliance  
with Rule 58 and 29(a), E.R.C.P. on 9/1/05

(53)

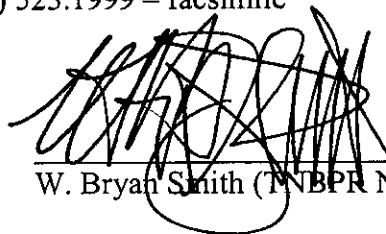
- (1) DISCLOSURE OF PLAINTIFF'S RULE 26 EXPERT INFORMATION: November 15, 2005
- (2) DISCLOSURE OF DEFENDANT'S RULE 26 EXPERT INFORMATION: January 15, 2006
- (3) EXPERT WITNESS DEPOSITIONS:  
Plaintiff's Expert(s) – December 15, 2005  
Defendants' Expert(s) – February 15, 2006
- (4) PLAINTIFF'S SUPPLEMENTAL EXPERT DISCLOSURES:  
March 15, 2006

Plaintiff relies on the Memorandum of Law filed in Support of said Plaintiff's Motion to Amend the Rule 16(b) Scheduling Order and Certificate of Consultation which reflects that there is no objection to the motion by counsel for the defendants herein.

Respectfully submitted:

THE COCHRAN FIRM – MEMPHIS  
One Commerce Square, Suite 2600  
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(901) 523.1222 – telephone  
(901) 523.1999 – facsimile

By:



W. Bryan Smith (TNBPR No. 18230)



## Notice of Distribution

This notice confirms a copy of the document docketed as number 53 in case 2:04-CV-03003 was distributed by fax, mail, or direct printing on September 7, 2005 to the parties listed.

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Honorable Bernice Donald  
US DISTRICT COURT